

To: Chew, Andrew[Chew.Andrew@epa.gov]; Alkon, Margaret[Alkon.Margaret@epa.gov]
Cc: Chen, Eugene[Chen.Eugene@epa.gov]
From: Chan, Janice
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As of June 2016 MCAQD has had the rotary dryer (and another dryer) permitted for the Arlington location, but under fuel burning. Same thing with ADEQ under the Ag BMP. There's no recordkeeping requirement for the opacity reading for the dryer. Also, I believe startup conditions aren't set in the permit. Rather, Hickman is supposed to notify MCAQD when they anticipate starting up. Isn't that essentially every day, or am I misunderstanding the purpose of the dryer?

Hickman has said they conduct monthly opacity readings on the rotary dryer system, but they have no records to provide.

Janice

Janice Chan

Environmental Protection Specialist

U.S. Environmental Protection Agency, Region 9

Enforcement Division

Air & TRI Section (ENF-2-1)

75 Hawthorne Street

San Francisco, CA 94105

P: 415-972-3308

F: 415-947-3519

Chan.Janice@epa.gov

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